



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AB:AL
F.#2009R01533

271 Cadman Plaza East
Brooklyn, New York 11201

July 26, 2010

By ECF and Hand Delivery

The Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Dudely Ernest Jerrick
Criminal Docket No. 09-591 (JG)

Dear Judge Gleeson:

The government respectfully requests permission to file a letter-brief in excess of the page limit set forth in the Court's Motion Practices. The letter-brief consists of seventeen single-spaced pages.

The letter-brief responds to the defendant's motion for discovery dated June 8, 2010 (Docket Entry No. 47). Although the defendant's motion is only two pages long, it seeks a broad range of discovery, specifically: (1) all documents regarding drug trafficking organizations that import drugs from Guyana, (2) all documents regarding cases in which drugs were smuggled in containers purporting to contain food or in which food-product containers were opened or inspected by Guyanese law enforcement agents, (3) all documents in cases in which drugs were smuggled from Guyana through passengers' luggage but without their knowledge, and (4) all documents concerning all instances in which someone alleged that drugs were smuggled from Guyana with the assistance of airport or airline personnel.

In its response, the government argues that these requests should be denied because they are not relevant to preparing the defense, they are unduly burdensome, and they are untimely. In order to apply these arguments to each category of requested material, the government respectfully submits that it requires additional space.

Accordingly, the government respectfully requests leave to file a seventeen-page letter-brief in response to the defendant's motion.

Respectfully submitted,

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UNITED STATES ATTORNEY

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cc: Kannan Sundaram, Esq. (via ECF)